

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE**

	X	
	:	
SNMP RESEARCH, INC. and SNMP	:	Case No. 3:20-cv-00451-CEA-DCP
RESEARCH INTERNATIONAL, INC.,	:	
	:	
Plaintiffs,	:	U.S. District Judge Charles E. Atchley, Jr.
	:	
v.	:	
	:	
BROADCOM INC.; BROCADE	:	
COMMUNICATIONS SYSTEMS LLC; and	:	
EXTREME NETWORKS, INC.,	:	
	:	
Defendants.	:	
	:	
	X	

**EXTREME NETWORKS, INC.'S MOTION FOR LEAVE
TO FILE DOCUMENTS UNDER SEAL**

Extreme Networks, Inc. ("Extreme"), by and through its counsel, pursuant to Fed. R. Civ. P. 5.2, Local Rule 26.2(b) of this Court and this Court's Memorandum and Order Regarding Sealing Confidential Information (ECF No. 11) ("Sealing Order"), seeks leave of this Court to submit its Memorandum of Law in Opposition to SNMP's Motion to Compel Discovery Responses From Defendant Extreme Networks, Inc. and Request for Costs and Counsel Fees Under Local Rule 37.2 ("Memorandum of Law") in redacted form.

Extreme moves for leave to file a redacted version of its Memorandum of Law because it references and discusses a pricing term on page 15 that SNMP Research, Inc. ("SNMP") has sought to file under seal. Extreme is not filing this Motion because of an independent reason to request that the information be sealed, including in view of the guidance from this Court in its Memorandum and Order addressing sealing (ECF No. 81). Rather, Extreme presents this motion

to the Court because SNMP previously sought to seal the information Extreme is citing (ECF No. 96-5), which is pending before the Court (ECF No. 97).

Pursuant to Local Rule 26.2, Extreme is publicly filing a redacted version of the Memorandum of Law pending a ruling on this Motion. Additionally, as required by the Court's Sealing Order, the unredacted version of the Memorandum of Law is provided as Exhibit 1 to this Motion with the portion of the document proposed to be redacted highlighted.

DATED: Palo Alto, California
October 18, 2021

Respectfully Submitted,

**SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP**

By: /s/ John M. Neukom
John M. Neukom (*admitted pro hac vice*)
515 University Avenue, Suite 1400
Palo Alto, California 94301
john.neukom@skadden.com
(650) 470-4500

Jordan A. Feirman (*admitted pro hac vice*)
Leslie A. Demers (*admitted pro hac vice*)
One Manhattan West
New York, New York 10001
jordan.feirman@skadden.com
leslie.demers@skadden.com
(212) 735-3000

Attorneys for Extreme Networks, Inc.

CERTIFICATE OF SERVICE

I hereby certify that Extreme Networks, Inc.'s Motion for Leave to File Documents Under Seal is being served on all counsel of record in the above-captioned litigation via electronic filing on this 18th day of October, 2021.

/s/ John M. Neukom

John M. Neukom

515 University Avenue, Suite 1400
Palo Alto, California 94301
john.neukom@skadden.com
(650) 470-4500